

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

EDDIE OLIVER,)	
)	
Plaintiff,)	
)	No. _____
v.)	
)	JURY DEMAND
HCA HEALTH SERVICES OF)	
TENNESSEE, INC., d/b/a)	
TRISTAR SUMMIT MEDICAL CENTER,)	
)	
Defendant.)	

**DECLARATION OF JOHN SPRAGENS
DEMONSTRATING PLAINTIFF'S COMPLAINT WITH
TENN. CODE ANN. § 29-26-121(A)(3)(B)**

1. My name is John Spragens. I am an adult citizen, over the age of 18 years, and am competent to make the statements contained in this Declaration.

2. On December 19, 2022, written notice of a potential healthcare liability action (attached as **Exhibit 1-A**) was mailed, including a list of the names and addresses of all other providers who were then being sent a notice, as well as HIPAA-compliant medical authorizations permitting all listed providers to obtain complete medical records from one another, by certified mail, return receipt requested (see **Exhibit 1-B**) via the U.S. Postal Service, to TriStar Summit Medical Center and related physicians at:

Attn: Daphne David, CEO 5655 Frist Boulevard Hermitage, TN 37076	1 Park Plaza Nashville, TN 37203-6527 Legal Dept. P.O. Box 750 Nashville, TN 37202-0750	CT Corporation System 300 Montvue Rd. Knoxville, TN 37919-5546
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I declare under penalty of perjury under the laws of Tennessee that the foregoing is true and correct.

Dated: April 18, 2023


JOHN SPRAGENS